

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, ET  
AL.,

Debtors.<sup>1</sup>

PROMESA  
Title III

Case No. 17-BK-03283 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF THE COMMONWEALTH  
OF PUERTO RICO,

PROMESA  
Title III

Case No. 17-BK-03566 (LTS)

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Debtor.

THE SPECIAL CLAIMS COMMITTEE OF THE  
FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO, ACTING BY AND  
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS  
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF PUERTO RICO,

Plaintiff,

v.

DEFENDANT 1M, ET AL.,

Defendants.

Adv. Proc. No. 19-00356 (LTS)

THE SPECIAL CLAIMS COMMITTEE OF THE  
FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO, ACTING BY AND  
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS  
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF PUERTO RICO,

Plaintiff,

v.

STOEVEER GLASS & CO., ET AL.,

Adv. Proc. No. 19-00357 (LTS)

Defendants.

THE SPECIAL CLAIMS COMMITTEE OF THE  
FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO, ACTING BY AND  
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS  
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF PUERTO RICO,

Plaintiff,

v.

DEFENDANT 1H-78H,

Defendants.

Adv. Proc. No. 19-00359 (LTS)

THE SPECIAL CLAIMS COMMITTEE OF THE  
FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO, ACTING BY AND  
THROUGH ITS MEMBERS,

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS  
(OTHER THAN COFINA),

as co-trustees of

THE EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF PUERTO RICO,

Plaintiff,

Adv. Proc. No. 19-00361 (LTS)

v.

DEFENDANT 1G-50G, et al.,

Defendants.

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF  
PUERTO RICO,

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS (OTHER  
THAN COFINA),

as section 926 trustee of

THE COMMONWEALTH OF PUERTO RICO

Plaintiffs,<sup>2</sup>

v.

ANDALUSIAN GLOBAL DESIGNATED ACTIVITY  
COMPANY; THE BANK OF NEW YORK MELLON;  
MASON CAPITAL MASTER FUND LP; OCHER  
ROSE, L.L.C.; SV CREDIT, L.P.; CROWN  
MANAGED ACCOUNTS FOR AND ON BEHALF  
OF CROWN/PW SP; LMA SPC FOR AND ON  
BEHALF OF MAP 98 SEGREGATED PORTFOLIO;  
OCEANA MASTER FUND LTD.; PENTWATER  
MERGER ARBITRAGE MASTER FUND LTD.;  
AND PWCM MASTER FUND LTD,

Adv. Proc. No. 19-00366 (LTS)

<sup>2</sup> The Official Committee of Unsecured Creditors serves as section 926 trustee and co-plaintiff in the prosecution of this adversary proceeding pursuant to Docket No. 6990, which is incorporated herein by reference.

Defendants.	)	
	)	
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	)	Adv. Proc. No. 19-00367 (LTS)
as representative of	)	
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO,	)	
and	)	
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS (OTHER THAN COFINA),	)	
as section 926 trustee of	)	
THE COMMONWEALTH OF PUERTO RICO	)	
Plaintiffs, <sup>3</sup>	)	
v.	)	
GLENDON OPPORTUNITIES FUND, L.P.;	)	
OAKTREE-FORREST MULTI-STRATEGY, LLC	)	
(SERIES B); OAKTREE OPPORTUNITIES FUND	)	
IX, L.P.; OAKTREE OPPORTUNITIES FUND IX	)	
(PARALLEL 2), L.P.; OAKTREE VALUE	)	
OPPORTUNITIES FUND, L.P.; PUERTO RICO AAA	)	
PORTFOLIO BOND FUND, INC.; PUERTO RICO	)	
AAA PORTFOLIO BOND FUND II, INC.; PUERTO	)	
RICO AAA PORTFOLIO TARGET MATURITY	)	
FUND, INC.; PUERTO RICO FIXED INCOME	)	
FUND, INC.; PUERTO RICO FIXED INCOME	)	
FUND II, INC.; PUERTO RICO FIXED INCOME	)	
FUND III, INC.; PUERTO RICO FIXED INCOME	)	
FUND IV, INC.; PUERTO RICO FIXED INCOME	)	
FUND V, INC.; PUERTO RICO GNMA & U.S.	)	

<sup>3</sup> The Official Committee of Unsecured Creditors serves as section 926 trustee and co-plaintiff in the prosecution of this adversary proceeding pursuant to Docket No. 6990, which is incorporated herein by reference.

GOVERNMENT TARGET MATURITY FUND, )  
INC.; PUERTO RICO INVESTORS BOND FUND I; )  
PUERTO RICO INVESTORS TAX-FREE FUND, )  
INC.; PUERTO RICO INVESTORS TAX-FREE )  
FUND II, INC.; PUERTO RICO INVESTORS TAX- )  
FREE FUND III, INC.; PUERTO RICO INVESTORS )  
TAX-FREE FUND IV, INC.; PUERTO RICO )  
INVESTORS TAX-FREE FUND V, INC.; PUERTO )  
RICO INVESTORS TAX-FREE FUND VI, INC.; )  
PUERTO RICO MORTGAGE-BACKED & U.S. )  
GOVERNMENT SECURITIES FUND, INC.; TAX- )  
FREE PUERTO RICO FUND, INC.; TAX-FREE )  
PUERTO RICO FUND II, INC.; TAX-FREE PUERTO )  
RICO TARGET MATURITY FUND, INC.; UBS IRA )  
SELECT GROWTH & INCOME PUERTO RICO )  
FUND, )  
 )  
Defendants. )  
 )

**JOINT INFORMATIVE MOTION SUBMITTING PROPOSED ORDER REGARDING  
DISCOVERY AND BRIEFING SCHEDULE WITH RESPECT TO CERTAIN ISSUES  
RAISED IN CERTAIN CONTESTED MATTERS AND ADVERSARY PROCEEDINGS  
RELATED TO THE BONDS ISSUED BY THE EMPLOYEES RETIREMENT SYSTEM  
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

To the Honorable United States District Judge Laura Taylor Swain:

1. Pursuant to this Court's Order (ECF No. 12715 in Case No. 17-bk-3283 and ECF No. 858 in Case No. 17-bk-3566), the undersigned Parties respectfully submit the proposed order attached hereto as **Exhibit A**.

*[Remainder of Page Intentionally Left Blank]*

Dated: April 14, 2020  
New York, NY

Respectfully submitted,

/s/ Alfredo Fernández-Martínez  
Alfredo Fernández-Martínez  
**DELGADO & FERNÁNDEZ, LLC**  
PO Box 11750  
Fernández Juncos Station  
San Juan, Puerto Rico 00910-1750  
Tel. (787) 274-1414  
Fax: (787) 764-8241  
afernandez@delgadofernandez.com  
USDC-PR 210511

/s/ Bruce Bennett  
Bruce Bennett (*pro hac vice*)  
**JONES DAY**  
555 South Flower Street Fiftieth Floor  
Los Angeles, California 90071  
Tel. (213) 489-3939  
Fax: (213) 243-2539  
bbennett@jonesday.com

Benjamin Rosenblum (*pro hac vice*)  
**JONES DAY**  
250 Vesey Street  
New York, New York 10281  
Tel. (212) 326-3939  
Fax: (212) 755-7306  
brosenblum@jonesday.com

Geoffrey S. Stewart (*pro hac vice*)  
Matthew Papez (*pro hac vice*)  
Beth Heifetz (*pro hac vice*)  
Sparkle L. Sooknanan (*pro hac vice*)  
**JONES DAY**  
51 Louisiana Ave. N.W.  
Washington, DC 20001  
Tel. (202) 879-3939  
Fax: (202) 626-1700  
gstewart@jonesday.com  
mpapez@jonesday.com  
bheifetz@jonesday.com  
ssooknanan@jonesday.com

Respectfully submitted,

/s/ Margaret A. Dale  
Martin J. Bienenstock (*pro hac vice*)  
Brian S. Rosen (*pro hac vice*)  
Jeffrey W. Levitan (*pro hac vice*)  
Margaret A. Dale (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036  
Tel: (212) 969-3000  
Fax: (212) 969-2900  
Email: mbienenstock@proskauer.com  
Email: brosen@proskauer.com  
Email: jlevitan@proskauer.com  
Email: mdale@proskauer.com  
Luis F. del Valle-Emmanueli  
USDC-PR No. 209514  
P.O. Box 79897  
Carolina, Puerto Rico 00984-9897  
Tel. 787.977.1932  
Fax. 787.722.1932  
dvelawoffices@gmail.com

OF COUNSEL FOR  
A&S LEGAL STUDIO, PSC  
434 Avenida Hostos  
San Juan, PR 00918  
Tel: (787) 751-6764/ 763-0565  
Fax: (787) 763-8260

*Attorneys for the Financial Oversight and  
Management Board for Puerto Rico, as  
representative of the Employees Retirement  
System of the Government of the  
Commonwealth of Puerto Rico*

/s/ Sunni P. Beville

**BROWN RUDNICK LLP**  
Edward S. Weisfelner, Esq. (Pro Hac Vice)  
Seven Times Square  
New York, NY 10036

*Counsel for Altair Global Credit Opportunities Fund (A), LLC, Andalusian Global Designated Activity Company, Crown Managed Accounts for and on behalf of Crown/PW SP, Glendon Opportunities Fund, L.P., LMA SPC for and on behalf of Map 98 Segregated Portfolio, Mason Capital Master Fund LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel), L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Huntington Investment Fund II, L.P., Oaktree Opportunities Fund X, L.P., Oaktree Opportunities Fund X (Parallel), L.P., Oaktree Opportunities Fund X (Parallel 2), L.P., Oaktree Value Opportunities Fund Holdings, L.P., Oceana Master Fund Ltd., Ocher Rose, L.L.C., Pentwater Merger Arbitrage Master Fund Ltd., PWCM Master Fund Ltd., Redwood Master Fund, Ltd., and SV Credit, L.P.*

Tel: (212) 209-4800  
eweisfelner@brownrudnick.com

Sunni P. Beville, Esq. (Pro Hac Vice)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
sbeville@prownrudnick.com

*Counsel to the Special Claims Committee*

/s/ Alberto Estrella

ESTRELLA, LLC  
Alberto Estrella (USDC-PR 209804)  
Kenneth C. Suria (USDC-PR 213302)  
P.O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Tel: (787) 977-5050  
Fax: (787) 977-5090

*Local Counsel to the Special Claims Committee*

/s/Alicia I. Lavernge-Ramírez

José C. Sánchez-Castro  
USDC-PR 213312  
Alicia I. Lavernge-Ramírez  
USDC-PR 215112  
**SÁNCHEZ PIRILLO LLC**  
270 Muñoz Rivera Avenue, Suite 1110  
San Juan, PR 00918  
Tel. (787) 522-6776  
Fax: (787) 522-6777  
jsanchez@sanpir.com  
alavernge@sanpir.com

/s/ Jesse L. Green

Glenn M. Kurtz (*pro hac vice*)  
John K. Cunningham (*pro hac vice*)  
**WHITE & CASE LLP**  
1221 Avenue of the Americas  
New York, NY 10036

/s/ Catherine Steege

JENNER & BLOCK LLP  
Robert Gordon (admitted pro hac vice)  
Richard Levin (admitted pro hac vice)  
919 Third Ave  
New York, NY 10022-3908  
rgordon@jenner.com  
rlevin@jenner.com  
212-891-1600 (telephone)  
212-891-1699 (facsimile)

Catherine Steege (admitted pro hac vice)  
Melissa Root (admitted pro hac vice)  
Landon Raiford (admitted pro hac vice)  
353 N. Clark Street  
Chicago, IL 60654  
csteeg@jenner.com  
mroot@jenner.com  
lraiford@jenner.com  
312-222-9350 (telephone)  
312-239-5199 (facsimile)



Tel. (212) 819-8200  
Fax (212) 354-8113  
gkurtz@whitecase.com  
jcunningham@whitecase.com

Jason N. Zakia (*pro hac vice*)  
Cheryl T. Sloane (*pro hac vice*)  
Jesse L. Green (*pro hac vice*)  
**WHITE & CASE LLP**  
200 S. Biscayne Blvd., Suite 4900  
Miami, FL 33131  
Tel. (305) 371-2700  
Fax (305) 358-5744  
jzakia@whitecase.com

*Counsel for Puerto Rico AAA Portfolio Bond Fund, Inc.; Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc.; Puerto Rico Fixed Income Fund, Inc.; Puerto Rico Fixed Income Fund II, Inc.; Puerto Rico Fixed Income Fund III, Inc.; Puerto Rico Fixed Income Fund IV, Inc.; Puerto Rico Fixed Income Fund V, Inc.; Puerto Rico Fixed Income Fund VI, Inc.; Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc.; Puerto Rico Investors Bond Fund I; Puerto Rico Investors Tax-Free Fund, Inc.; Puerto Rico Investors Tax-Free Fund II, Inc.; Puerto Rico Investors Tax-Free Fund III, Inc.; Puerto Rico Investors Tax-Free Fund IV, Inc.; Puerto Rico Investors Tax-Free Fund V, Inc.; Puerto Rico Investors Tax-Free Fund VI, Inc.; Puerto Rico Mortgage-Backed & U.S. Government Securities Fund, Inc.; Tax-Free Puerto Rico Fund, Inc.; Tax-Free Puerto Rico Fund II, Inc.; Tax-Free Puerto Rico Target Maturity Fund, Inc.; and UBS IRA Select Growth & Income Puerto Rico Fund*

SEPULVADO, MALDONADO & COURET

/s/ A.J. Bennazar-Zequeira

**BENNAZAR, GARCÍA & MILIÁN, C.S.P**  
A.J. Bennazar-Zequeira  
Héctor M. Mayol Kauffmann  
Francisco del Castillo Orozco  
Edificio Union Plaza,  
1701 Avenida Ponce de León #416  
Hato Rey, San Juan  
Puerto Rico 00918  
ajb@bennazar.org  
hector.mayol@bennazar.com  
787-754-9191 (telephone)  
787-764-3101 (facsimile)

*Counsel for the Official Committee of Retired Employees of Puerto Rico*

Respectfully submitted,

/s/ Luc A. Despins

**PAUL HASTINGS LLP**  
Luc A. Despins (*Pro Hac Vice*)  
James R. Bliss, Esq. (*Pro Hac Vice*)  
James B. Worthington, Esq. (*Pro Hac Vice*)  
G. Alexander Bongartz (*Pro Hac Vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
lucdespins@paulhastings.com  
jamesbliss@paulhastings.com  
jamesworthington@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured Creditors*

/s/ Juan J. Casillas Ayala

**CASILLAS, SANTIAGO & TORRES LLC**  
Juan J. Casillas Ayala, Esq. (USDC – PR 218312)

By: /s/ Albéniz Couret-Fuentes  
Albéniz Couret-Fuentes  
USDC-PR Bar No. 222207  
304 Ponce de León Ave. – Suite 990  
San Juan, PR 00918  
Telephone: (787) 765-5656  
Facsimile: (787) 294-0073  
Email: [acouret@smclawpr.com](mailto:acouret@smclawpr.com)

REED SMITH LLP  
Eric A. Schaffer (*Pro Hac Vice*)  
Luke A. Sizemore (*Pro Hac Vice*)  
225 Fifth Avenue, Suite 1200  
Pittsburgh, PA 15222  
Telephone: (412) 288-3131  
Facsimile: (412) 288-3063  
Email: [eschaffer@reedsmith.com](mailto:eschaffer@reedsmith.com)  
Email: [lsizemore@reedsmith.com](mailto:lsizemore@reedsmith.com)

By: /s/ C. Neil Gray  
C. Neil Gray (*Pro Hac Vice*)  
599 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 521-5400  
Facsimile: (212) 521-5450  
Email: [cgray@reedsmith.com](mailto:cgray@reedsmith.com)

*Counsel to The Bank of New York Mellon,  
as fiscal agent*

Israel Fernández Rodríguez, Esq. (USDC – PR  
22504)  
Juan C. Nieves González, Esq. (USDC – PR  
231707)  
Cristina B. Fernández Niggemann, Esq. (USDC  
– PR 306008)  
PO Box 195075  
San Juan, Puerto Rico 00919-5075  
Telephone: (797) 523-3434  
Fax: (797) 523-3433  
[jcasillas@cstlawpr.com](mailto:jcasillas@cstlawpr.com)  
[ifernandez@cstlawpr.com](mailto:ifernandez@cstlawpr.com)  
[jnieves@cstlawpr.com](mailto:jnieves@cstlawpr.com)  
[cfernandez@ctslawpr.com](mailto:cfernandez@ctslawpr.com)

*Local Counsel to the Official Committee of  
Unsecured Creditors*

/s/ John Arrastia

**GENOVESE JOBLOVE & BATTISTA, P.A.**  
John Arrastia, Esq. (*Pro Hac Vice*)  
John H. Genovese, Esq. (*Pro Hac Vice*)  
Jesus M. Suarez, Esq. (*Pro Hac Vice*)  
Mariaelena Gayo-Guitian, Esq. (*Pro Hac Vice*)  
100 SE 2nd Street, Suite 4400  
Miami, Florida 33131  
Tel: 305-349-2300  
[jarrastia@gjb-law.com](mailto:jarrastia@gjb-law.com)  
[jgenovese@gjb-law.com](mailto:jgenovese@gjb-law.com)  
[jsuarez@gjb-law.com](mailto:jsuarez@gjb-law.com)  
[mguitian@gjb-law.com](mailto:mguitian@gjb-law.com)

*Special Litigation Counsel to the  
Official Committee of Unsecured Creditors*